

## Cooper & Kirk

Lawyers

A Professional Limited Liability Company

Nicole Jo Moss  
(202) 220-9660  
nmoss@cooperkirk.com

1523 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

(202) 220-9600  
Fax (202) 220-9601

May 5, 2021

### VIA ECF

The Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-cv-3377-LAP**  
Permission To File Under Seal

Dear Judge Preska:

① I write on behalf of Plaintiff Virginia Giuffre. Pursuant to Rule 1.A of Your Honor's Individual Practices, Plaintiff respectfully requests permission to file under seal, with a redacted version filed on the public docket, her response to Defendant's motion to compel filed under seal on May 4, 2021, *see* Doc. 297. In support of this request, we note that the Court granted Defendant leave to file his motion under seal, *see* Doc. 296, and Plaintiff will both be responding to that sealed filing, as well as possibly attaching documents that have been designated as confidential under applicable protective orders.

② In addition, we request permission to disclose and discuss Defendant's sealed motion, together with its exhibits, with Plaintiff's prior counsel, on the ground that their communications are the object of Defendant's motion. In support of this request, Plaintiff notes that her prior counsel already have access to the confidential material attached to or discussed in Defendant's motion by virtue of their participation in *Giuffre v. Maxwell*, Case No. 15-cv-7433-LAP (S.D.N.Y.) and *Boies v. Dershowitz*, Index No. 160874/2019 (N.Y. Sup. Ct. N.Y. Cnty.) and that the Court previously granted Plaintiff leave to share similar, if not identical, information contained in Defendant's pre-motion letter on this same topic with her prior counsel, *see* Doc. 278.

③ Because the sealed material is subject to the protective order, sealing is appropriate.

Respectfully,

s/Nicole J. Moss  
Nicole J. Moss

cc: Counsel of Record

s/6/21

SO ORDERED

Loretta A. Preska  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE